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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 VPN.COM LLC,
20 *Plaintiff,*

21 vs.

22 GEORGE DIKIAN;
23 QIANG DU; and
24 JOHN DOE

25 *Defendants.*

Case No: 2:22-cv-04453-AB-MAR

PLAINTIFF'S REQUEST FOR THE
CLERK TO ENTER THE DEFAULT
OF DEFENDANT QIANG DU

To the Clerk of the United States District Court for the Central District of California:

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff VPN.COM LLC (“VPN”) hereby respectfully requests that the Clerk enter the default of Defendant Qiang Du (“Defendant Du”) in this action for failure to plead or otherwise defend against this action in a timely manner.

On September 8, 2022, this Court granted VPN’s request for alternative service and Ordered that VPN serve Defendant Du with the Summons, Complaint, and other initiating documents by email. *See* ECF 18 at p. 5. The Court further Ordered that Defendant Du would have 21 days to answer the Complaint from the filing of VPN’s proof of service. *Id.*

On September 14, 2022, VPN served Defendant Du with the required documents by the required means and filed the confirmation and proof of service. *See* ECF 20.

Defendant Du thus had until October 5, 2022 to respond to the Complaint (21 days from September 14, 2022). To date, however, Defendant Du has failed to answer or otherwise respond to the Complaint in this action.

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1 Accordingly, VPN respectfully requests that the Clerk, pursuant to
2 Federal Rule of Civil Procedure 55(a), enter the default of Defendant Du in this
3 action.
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6 DATED: October 7, 2022

7 Brett E. Lewis
8 Michael D. Cilento
9 **LEWIS & LIN, LLC**

10 Ji-In Lee Houck (SBN 280088)
11 **STALWART GROUP**

12 By: 
13 Michael D. Cilento (*pro hac vice*)
14 Attorneys for Plaintiff VPN.COM LLC
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Proof of Service

I, the undersigned, certify and declare that (i) I am over the age of 18 years, (ii) I am not a party to this action, (iii) I am admitted to practice law in this Court and case *pro hac vice*, and (iv) on October 7, 2022, I served a true and correct copy of the following documents to the following individuals by the following means (pursuant to this Court's Order at ECF 18 directing that service be performed by email):

Document: Plaintiff's Request for the Clerk to Enter the Default of Defendant
Qiang Du

To: George Dikian via email to G.Dikian@yahoo.com and George@37.net

To: Qiang Du via email to rhwdomains@gmail.com

I declare under the penalty of perjury that the foregoing is true and correct.

October 7, 2022:

By: 
Michael D. Cilento